



Environmental Technologies Group
ROCKY FLATS SOLARPOND/PONDCRETE PROJECT
452 BURBANK STREET
EG&G BUILDING 025
BROOMFIELD, COLORADO 80020



December 3, 1992

Mr. Edward M. Lee, Jr.
Program Manager
Solar Ponds Remediation Program
EG&G Rocky Flats, Inc.
Building 080
P.O. Box 464
Golden, Colorado 80402-0464

Subject: Rocky Flats Solar Evaporation Ponds Stabilization Project
[WBS 710 PROJECT MANAGEMENT - HALLIBURTON NUS ROCKY FLATS]
CDH Air Pollution Control Division Notification Of Delay In 207C
Pond Processing
RF-HED-92-0835

Dear Mr. Lee:

It is necessary for Halliburton NUS (HNUS) to notify the CDH Air Pollution Control Division of EG&G's intent to defer 207C Pond processing until FY1994, and 207A/B processing until some future date (to be determined). Notification is necessary in order to defer the expiration date of our Emission Permits for equipment to be used in both processes.

HNUS is furnishing EG&G a draft of the notification letter, and a copy of one of our Emission Permits for your review. The key requirements that address Permit expiration are contained in Item 4 on the first page and Item 6 on the second page.

A lengthy lead time is required for CDH to evaluate the Air Pollution Emission Notices (APENs) that we provide them, and to issue initial approval on the Emission Permits. It is in our best interest to suspend the Permits for the present time and to amend them (prior to processing) to reflect any changes that may have occurred during the delay period.

We request your review of the enclosed documents to ensure that the representations made by HNUS coincide with EG&G's plans for the Project. Please inform me of your concurrence, or of any changes to the notification letter that are required. We will not transmit this letter to the CDH until we have received your comments.

Sincerely,

HALLIBURTON NUS ENVIRONMENTAL
CORPORATION

Ted A. Bittner
Ted A. Bittner
Project Manager

Enclosures

cc: B. Allen
S. Heiman

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

A-DU04-000432

ADMIN RECORD

technologies and services for a cleaner and safer world

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH
AIR POLLUTION CONTROL DIVISION
TELEPHONE: (303) 331-8576



EMISSION PERMIT

PERMIT NO: 92JE610-1

INITIAL APPROVAL

DATE ISSUED: September 24, 1992

ISSUED TO: HALLIBURTON NUS ENVIRONMENTAL CORPORATION

THE SOURCE TO WHICH THIS PERMIT APPLIES IS DESCRIBED AND LOCATED AS FOLLOWS:

Cementation of hazardous wastes at Ponds 207 A, B, and C at the Rocky Flats Plant,
Jefferson County, Colorado.

THE SPECIFIC EQUIPMENT OR ACTIVITY SUBJECT TO THIS PERMIT INCLUDES THE FOLLOWING:

Caterpillar diesel engine unit #1, model 3406, serial number 1702101124.

THIS PERMIT IS GRANTED SUBJECT TO ALL RULES AND REGULATIONS OF THE COLORADO AIR QUALITY CONTROL COMMISSION AND THE COLORADO AIR QUALITY CONTROL ACT C.R.S. (25-7-101 et seq), TO THOSE GENERAL TERMS AND CONDITIONS SET FORTH ON THE REVERSE SIDE OF THIS DOCUMENT AND THE FOLLOWING SPECIFIC TERMS AND CONDITIONS:

1. Visible emissions shall not exceed twenty percent (20%) opacity.
2. The permit number shall be marked on the subject equipment for ease of identification.
3. The manufacturer, model number and serial number of the subject equipment shall be provided to the Division prior to Final Approval.
4. Construction of this source must commence within 18 months of initial approval permit issuance or within 18 months of the start-up date stated in the application. If commencement does not occur within the stated time the permit will expire on March 24, 1994
(See General Condition No. 6., Item 1 on the reverse side of the first page of this permit.)

GENERAL TERMS AND CONDITIONS: (IMPORTANT! READ ITEMS 6,7 AND 8)

1. This permit is issued in reliance upon the accuracy and completeness of information supplied by the applicant and is conditioned upon conduction of the activity, or construction, installation and operation of the source, in accordance with this information and with representations made by the applicant or applicant's agents. It is valid only for the equipment and operations or activity specifically identified on the permit.
 2. Unless specifically stated otherwise, the general and specific conditions contained in this permit have been determined by the APCD to be necessary to assure compliance with the provisions of Section 25-7-114, C.R.S. and, as such, shall be enforceable under the provisions of Section 25-7-115, C.R.S., the Clean Air Act, 42 USC Section 7502(b)(3); and Air Quality Control Commission Regulation No. 3 Section IV.D.2. or (2) result in an exceedance of the NAAQS for pollutants as required by Sections 25-7-105(1)(A)(1) and 201(1)(b), C.R.S., of the Clean Air Act; 42 USC Section 7475(a)(3); and Air Quality Control Commission Regulation No. 3, Section IV.D.1.c.
 3. Each and every condition of this permit is a material part hereof and is not severable. Any challenge to or appeal of, a condition hereof shall constitute a rejection of the entire permit and upon such occurrence, this permit shall be deemed denied *ab initio*. This permit may be revoked at any time prior to final approval by the Air Pollution Control Division (APCD) on grounds set forth in the Colorado Air Quality Control Act and regulations of the Air Quality Control Commission (AQCC), including failure to meet any express term or condition of the permit.
 4. This permit and any required attachments must be retained and made available for inspection upon request at the location set forth herein. With respect to a portable source which is moved to a new location, a copy of the revised Air Pollutant Emissions Notice (APEN) (required by law to be submitted to the APCD whenever a portable source is relocated) should be attached to this permit. The permit may be reissued to a new owner by the APCD as provided in AQCC Regulation No. 3 Section III.B. upon a request for transfer of ownership and the submittal of a revised APEN and the required fee.
 5. Issuance (initial approval) of an emission permit does not provide "final" authority for this activity or operation of this source. Final approval of the permit must be secured from the APCD in writing in accordance with the provisions of 25-7-114.5 C.R.S. and AQCC Regulation No. 3, Section IV.H. Final approval cannot be granted until the operation or activity commences and has been verified by the APCD as conforming in all respects with the conditions of the permit. If the APCD so determines, it will provide written documentation of such final approval, which does constitute "final" authority to operate.
6. THIS PERMIT AUTOMATICALLY EXPIRES IF you (1) do not commence construction or operation within 18 months after either the date of issuance of this permit or the date on which such construction or activity was scheduled to commence as set forth in the permit, whichever is later; (2) discontinue construction for a period of 18 months or more; or (3) do not complete construction within a reasonable time of the estimated completion date. Extensions of the expiration date may be granted by the APCD upon a showing of good cause by the permittee.
 7. YOU MUST notify the APCD at least thirty days (fifteen days for portable sources) prior to commencement of the permitted operation or activity. Failure to do so is a violation of Section 25-7-114.5(12)(a), C.R.S. and AQCC Regulation No. 3, Section IV.H.1., and can result in the revocation of the permit.
 8. Section 25-7-114(5)(a), C.R.S. requires that all sources required to file an Air Pollution Emission Notice (APEN) must pay an annual fee to cover the costs of inspections and administration. If a source or activity is to be discontinued, the owner must notify the Division in writing requesting a cancellation of the permit. Upon notification, annual fee billing will terminate.
9. Violation of the terms of a permit which has received final approval or of the provisions of the Colorado Air Quality Control Act or the regulations of the AQCC may result in administrative, civil or criminal enforcement actions under Sections 25-7-115 (enforcement), -121 (injunctions), -122 (civil penalties), C.R.S.

HALLIBURTON NUS ENVIRONMENTAL CORPORATION

Permit No. 92JE610-1

Initial Approval

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5. Emissions of air pollutants shall not exceed the following limitations (as calculated in the Division's preliminary analysis):

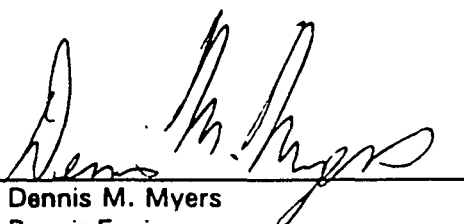
Particulate Matter:	0.31 tons per year
Sulfur Dioxide:	0.29 tons per year
Nitrogen Oxides:	4.28 tons per year
Volatile Organic Compounds:	0.29 tons per year
Carbon Monoxide:	0.93 tons per year
PM10:	0.29 tons per year

6. This source shall be limited to a maximum consumption rate as listed below and all other activities, operational rates and numbers of equipment as stated in the application. Annual records of the actual consumption rate shall be maintained by the applicant and made available to the Division for inspection upon request.


Consumption of #2 diesel fuel shall not exceed 18,240 gallons per year.

7. At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the Division, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
8. This permit shall expire six (6) months from the issue date listed above.

By:


Dennis M. Myers
Permit Engineer

By:


James S. Geier, P.E., Chief
New Source Review Section
Stationary Sources Program
Air Pollution Control Division

1140/3/225